

EXHIBIT 7

Hill, Brian

From: Hill, Brian
Sent: Thursday, August 12, 2010 1:33 PM
To: 'Max Wistow'; djs@mtlhlaw.com
Cc: Rochon, Mark; Wise, Andrew; dsherman@eapdlaw.com
Subject: RE: Ungar v. PA
Counsel,

We have had an opportunity to consider the schedule you propose below and have the following counter-proposal:

- October 1, 2010: both parties disclose fact witnesses and exhibits as required by FRCP 26(a)(3).
- October 15, 2010: both parties disclose expert witnesses and reports as required by FRCP 26(a)(2).
- October 29, 2010: both parties disclose any rebuttal expert witnesses and reports as required by FRCP 26(a)(2).

We look forward to speaking with you today at 3:00 p.m.

Regards,

Brian A. Hill
Miller & Chevalier, Chtd
655 15th Street, NW Suite 900
Washington, DC 20005
Direct: (202) 626-6014
Fax: (202) 626-5801

From: Max Wistow [mailto:MW@wistbar.com]
Sent: Tuesday, August 10, 2010 12:23 PM
To: Hill, Brian; djs@mtlhlaw.com
Cc: Rochon, Mark; Wise, Andrew; dsherman@eapdlaw.com; M Haller
Subject: RE: Ungar v. PA

Counsel,

Please check the Federal Rules with regard to the effect of State holidays. Yesterday was a State holiday in Rhode Island.

We propose you identify and disclose documentary evidence, names of witnesses, and a brief summary of their testimony by October 1, 2010. We will do the same by November 1, 2010. Expert disclosures by both parties to be made by October 15, 2010, depositions of experts between October 16th and November 17, 2010. This proposal is subject to good faith negotiations this Thursday at 3:00 p.m. (not August 12th, as you now propose) with regard to your responses to our Requests

10/22/2010

(first and second) for production and your answers to our Interrogatories.

You will receive the discovery that we owe on a timely basis.

We are prepared to file motions if we do not have a second meet and confer (which we reluctantly agreed to at your request) on this coming Thursday, or if we fail to come to a satisfactory resolution of the open issues.

Max Wistow, Esq
Wistow and Barylick Incorporated
61 Weybosset Street
Providence, RI 02903
401-831-2700
401-272-9752 (fax)
mwistow@wistbar.com

-----Original Message-----

From: Hill, Brian [mailto:BHill@milchev.com]
Sent: Tuesday, August 10, 2010 10:58 AM
To: djs@mtlhlaw.com; Max Wistow
Cc: Rochon, Mark; Wise, Andrew; dsherman@eapdlaw.com
Subject: Ungar v. PA

Counsel,

During our conference call last Thursday you agreed to provide us with a proposed schedule for disclosure of hearing exhibits, witnesses and expert reports by no later than yesterday, Monday August 9. We have yet to receive your proposal.

Plaintiffs' responses to Defendants' First Set of Interrogatories and Requests for Production we also due yesterday, but we have yet to receive them.

Accordingly, we will have to adjust the timing of our planned follow on call which had previously been set for 3:00 p.m. Thursday, August 12.

Please advise as to when we can expect your (1) proposed schedule and (2) responses to interrogatories and requests for production.

Regards,

Brian A. Hill
Miller & Chevalier, Chtd
655 15th Street, NW Suite 900
Washington, DC 20005
Direct: (202) 626-6014
Fax: (202) 626-5801